

JACKLYN ARMELIN

NUMBER 137507 DIV. B

## VERSUS

**16<sup>TH</sup> JUDICIAL DISTRICT COURT**

**RAINBOW USA, INC., and  
SAVOYE HOWARD**

## PARISH OF IBERIA

**STATE OF LOUISIANA**

**PETITION FOR DAMAGES**

**NOW INTO COURT**, through undersigned counsel, comes Petitioner, Jacklyn Armelin, a person of the full age of majority who is domiciled in the Parish of Iberia, State of Louisiana, who respectfully avers as follows:

1.

Made defendants herein are:

1. **RAINBOW USA, INC**, a foreign corporation authorized to do and doing business in the Parish of Iberia, State of Louisiana, and at all times pertinent hereto, the employer of both your petitioner and her superior, the Defendant, Savoye Howard;
  2. **SAVOYE HOWARD**, a person of the full age of majority who is domiciled in the Parish of Iberia, State of Louisiana, and at all times pertinent hereto, the superior to the petitioner;

who are indebted to Petitioner, Jacklyn Armelin, for general, compensatory, and special damages in a principal amount that is reasonable in the premises, together with legal interest on the principal amount awarded from the date of judicial demand until paid and for all costs of this proceeding, including any expert witness fees, for the following reasons, to wit:

2.

Petitioner, Jacklyn Armelin (hereinafter referred to as "Armelin"), shows that in June of 2020, she began working at Rainbow USA, Inc., store number 595, located at 931 S. Lewis St., New Iberia, LA 70560, within the jurisdiction of this Court. Defendant,  
*FD-350-10000*  
Rainbow USA, Inc.'s place of business. Ms. Armelin was employed as the First Assistant Manager of the store. Shortly after beginning her employment for the Defendant, Ms.  
*DEPO. OF JACLYN ARMELIN  
NEW IBERIA, LA*

## **Exhibit A**

Armelin was introduced to the Store Manager, Defendant, Savoye Howard (hereinafter referred to as "Howard").

3.

Petitioner shows that in late June or early July of 2020, Howard began insisting that Armelin drive her home after work shifts since Howard did not have a car. Howard used those car rides as an opportunity to make inappropriate, offensive, and sexual comments to Armelin. Examples of such comments include but are not limited to:

- 1) Inquiring into Ms. Armelin's personal sex life;
- 2) Questions regarding if Ms. Armelin has had sexual relations with women;
- 3) Inquiring if Ms. Armelin is interested in having sexual relations with women.

4.

Petitioner objected to the aforementioned topics of discussion to Howard, expressing the inappropriate nature of these conversations and that these inquiries made Ms. Armelin extremely uncomfortable. Despite Petitioner's objection, Howard responded stating, "**If you want to work here with me, you have to make me happy.**" (*emphasis added*).

5.

Petitioner further shows that Howard's harassing behavior was not limited to car rides home from work, but frequently extended into the workplace. Howard routinely sent Ms. Armelin sexually explicit text messages and photos of herself with no invitation or prompting. While working together in the store Howard demanded Ms. Armelin to hand over her phone to afford Howard the opportunity to delete and send inappropriate texts to give off the appearance that Ms. Armelin was reciprocating and provoking these inappropriate advances. Again, when Ms. Armelin refused Howard's advances or expressed to Howard that these advances were inappropriate, harassing, and offensive Howard would respond to Ms. Armelin by stating, "**I am the store manager and I get**

what I want." (*emphasis added*).

6.

On or about August 15, 2020, Ms. Armelin again told Howard to stop engaging in this inappropriate and harassing conduct. Howard responded, "If you complain against me, let's see if you'll still be here at the end of your 90 days' probation. I can guarantee you won't be." (*emphasis added*). Subsequent to that conversation, Howard told Ms. Armelin to leave her shifts early, resulting in fewer hours worked, and lower income.

7.

Petitioner further shows that on September 4, 2020, she complained against Howard to Rainbow USA's Human Resources (HR) department. HR informed Ms. Armelin that an investigation would be conducted into the matter. To the Petitioner's knowledge and observations, no action or effort was ever pursued, or attempted to provide remedy to those conditions complained of herein by your Petitioner. Since receiving that notice from HR Ms. Armelin has not received an update, nor has she received information pertaining to her next shift. As such, Ms. Armelin can only conclude that she has been terminated in accordance with Howard's previous threats. This wrongful and retaliatory termination is in clear violation of the provisions of LSA-R.S. 23:967, and as such Defendant Rainbow USA, Inc., is liable to your Petitioner herein for general and compensatory damages.

8.

Defendants, Rainbow USA, Inc.'s and Savoye Howard committed the following non-exclusive list of acts amounting to sexual harassment, hostile work environment, quid pro quo, gender discrimination, intentional infliction of emotional distress, retaliation, carelessness, negligence, and wanton disregard for the safety and well-being of its employees, as is more particularly, but not exclusively described as follows:

- a. Failing to remedy the hostile work environment;
- b. Failing to properly investigate and act on the incidents and conditions

present that resulted in the ongoing hostile working environment, sexual harassment, and conduct leading up to your Petitioner's wrongful and retaliatory termination;

- c. Intentional infliction of emotional distress, by knowingly allowing the store manager, named Defendant Howard to harass and discriminate against your Petitioner;
- d. Wrongful retaliatory termination against your Petitioner for reporting the ongoing harassment and hostile working environment;
- e. Quid pro quo sexual harassment, by Howard in using her managerial position to seek sexual favors for extended hours, and higher income;
- f. Gender based discrimination;
- g. Quid pro quo sexual harassment;
- h. Intentional infliction of emotional distress;
- i. Other acts or omissions to be shown at trial.

9.

Plaintiff shows that as a direct and proximate cause of the Defendant's conduct she suffered damages as follows:

- a. Severe past, present, and future pain and suffering;
- b. Past, present, and future medical/psychological expenses;
- c. Mental Anguish and Inconvenience;
- d. Loss of enjoyment of life;
- e. Loss of income;
- f. Humiliation, stress, and anxiety;
- g. All other damages which are to be proven through discovery and/or trial.

10.

As a direct result of personal injuries sustained by Petitioner as a consequence of the accident made the subject of this proceeding, she has incurred and will continue to incur medical/psychological expenses which she is entitled to recover, including, but not limited to, diagnostic and treatment expenses, prescription medication charges,

rehabilitation and/or therapy charges, related travel expenses and/or any other related and necessary expenses.

11.

On September 16, 2020, through undersigned counsel, Petitioner notified Rainbow USA, Inc. of the discriminatory conduct in accordance with LSA-R.S. 23:303(C). More than thirty days have elapsed since, and as of this date, Petitioner has not received a response from Defendant, Rainbow USA, Inc. Rainbow USA, Inc. clearly has no intentions of making any good faith effort to remedy the discriminatory acts. Petitioner makes claim under all state laws applicable to such incidences and in particular LSA-R.S. 23:332 and LSA-R.S. 23:967.

WHEREFORE, Petitioner, **Jacklyn Armelin**, prays that Defendants, **Rainbow USA, Inc.**, and **Savoye Howard**, be served with this Petition for Damages and duly cited to appear and answer same, and following the expiration of all legal delays and after due proceedings had, there be judgment herein in favor of Petitioner, Jacklyn Armelin, and against Defendants, **Rainbow USA, Inc.**, and **Savoye Howard**, jointly, severally, and *in solido*, for general and special damages in a principal amount that is reasonable in the premises, together with legal interest on the principal amount awarded from the date of judicial demand, until paid, and for all costs and disbursements in bringing these causes.

Respectfully Submitted:

BIANCA LAW FIRM

By:   
DOMINICK M. BIANCA (LA Bar #26802)  
FIELDING C. MATKINS (LA Bar #39273)  
8212 Summa Ave.  
Baton Rouge, LA 70809  
Telephone 225-925-2877  
Facsimile 225-925-2875  
[rusty@biancalawfirm.com](mailto:rusty@biancalawfirm.com)  
[fielding@biancalawfirm.com](mailto:fielding@biancalawfirm.com)

-AND-

Eisenberg & Baum, L.L.P

By: Aydr. Alston-Moore  
AYO'R. ALSTON-MOORE (NY Bar# 5583018)  
(Application for Pro Hac Vice to be filed)  
ERIC BAUM (NY Bar# EB5493)  
(Application for Pro Hac Vice to be filed)  
24 Union Square East, Penthouse  
New York, New York 10003  
Telephone (212) 353-8700  
Facsimile (212) 353-1708  
[AAlstonMoore@EandBLaw.com](mailto:AAlstonMoore@EandBLaw.com)  
[EBaum@EandBLaw.com](mailto:EBaum@EandBLaw.com)

SERVICE INFORMATION:

**Savoya Howard**

*At her place of employment,*

Rainbow Store

931 S. Lewis St.

New Iberia, LA 70560

and

**Rainbow USA, Inc.**

*Through its registered agent,*

C T Corporation System

3867 Plaza Tower Dr.

Baton Rouge, LA 70816

LED  
FOR RECORD  
MAY 11 AM 10:55  
W. B. BONET  
DEPUTY CLERK OF COURT  
PARISH OF IBERIA, LA



Dominick M. Bianca, LLC

Email: [rusty@biancalawfirm.com](mailto:rusty@biancalawfirm.com)

May 26, 2021

Clerk of Court  
300 Iberia St., Suite 100  
New Iberia, LA 70560

VIA FED X

Re: Jacklyn Armelin v. Rainbow USA, Inc. and Savoye Howard  
Docket # 13-1507, 16<sup>th</sup> JDC

Dear Sir/Madam:

Please find attached a Petition for Damages in the above captioned matter.  
Please file same. Please return a file stamped copy to our office.

Also enclosed is our check in the amount of \$500.00 for the filing and service fees.

Should you have any questions, please do not hesitate to contact.

Very truly yours,

A handwritten signature in black ink, appearing to read "Cynthia Sanders".

CYNTHIA SANDERS  
Paralegal

8212 Summa Ave. Baton Rouge, LA 70809 · Phone (225)925-2877 · Fax (225)925-2875

CITATION

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC., ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

To: RAINBOW USA, INC.  
THROUGH ITS REGISTERED AGENT,  
CT CORPORATION SYSTEM  
3867 PLAZA TOWER DRIVE  
BATON ROUGE, LA 70816

of EAST BATON ROUGE Parish

You are hereby summoned to comply with the demand contained in the PETITION of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
3 DAY OF June, 2021

Clerk of Court  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

Deputy Clerk of Court

Requested by:  
AYO R. ALSTON-MOORE

[FILE COPY]

**CITATION**

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JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC., ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

---

To: SAVOYE HOWARD  
AT HER PLACE OF EMPLOYMENT,  
RAINBOW STORE  
931 S. LEWIS STREET  
NEW IBERIA, LA 70560

of IBERIA Parish

You are hereby summoned to comply with the demand contained in the **PETITION** of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
3 DAY OF *June 2021*

Clerk of Court  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

---

Deputy Clerk of Court

Requested by:  
AYO R. ALSTON-MOORE

**IBERIA PARISH SHERIFF'S OFFICE  
NEW IBERIA, LA**

Name Swoye Howard Case No. 00137507

**ADDRESS:**

- Moved to new address \_\_\_\_\_
- Moved - Address Unknown
- Post Office Box: Need Physical Address
- Not Known at this address
- Need: Trailer Number - Lot Number - Apartment Number
- No Such Address
- This address NOT in our Parish: address in \_\_\_\_\_ Parish

**OTHER:**

- Avoiding Service
- Not in Jail
- Unable to Locate
- Unable to Serve
- Numerous Attempts Made - No Response
- Need Name of Person to serve
- District Attorney recalled
- In the Armed Forces/Military
- Hospitalized/Deceased
- Received too late for service
- Stop Service per Clerk/Attorney
- No Longer Employed per employer
- Comments or other reasons for not serving:  

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*1 Attempt*

---

Joseph C. Noah III

# 1611

6-4-21 @ 2:43

Date

Deputy Sheriff

CITATION

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC., ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

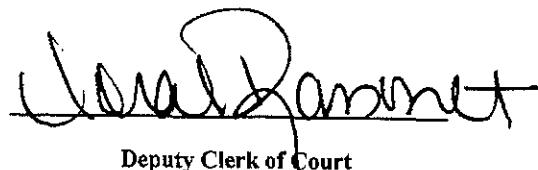
To: SAVOYE HOWARD  
AT HER PLACE OF EMPLOYMENT,  
RAINBOW STORE  
931 S. LEWIS STREET  
NEW IBERIA, LA 70560

of IBERIA Parish

You are hereby summoned to comply with the demand contained in the PETITION of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
3 DAY OF June 2021

Clerk of Court  
16<sup>th</sup> Judicial District Court  
Parish of Iberia



Deputy Clerk of Court

Requested by:  
AYO R. ALSTON-MOORE

JUN 4 AM 8:56

RECEIVED: \_\_\_\_\_  
SERVED: \_\_\_\_\_  
PERSONAL ( )  
DOMICILIARY ( ) ON \_\_\_\_\_  
DEPUTY \_\_\_\_\_

✓  
IBERIA PARISH SHERIFF DEPT.  
SHERIFF'S OFFICE  
1000 BAYOU DRIVE  
NEW IBERIA, LOUISIANA 70560

[ORIGINAL]

4 No longer

## NOTICE OF SERVICE

ARMELIN, JACKLYN

VERSUS

RAINBOW USA, INC. - ET AL

Case: 00137507

Division: B

State of Louisiana

16<sup>th</sup> Judicial District Court

Parish of Iberia

To: **DOMINICK BIANCA**  
**BIANCA LAW FIRM**  
**8212 SUMMA AVE**  
**BATON ROUGE, LA 70809**

Party **SAVOYE HOWARD AT HER PLACE OF EMPLOYMENT, RAINBOW STORE**  
was **NOT SERVED.**

Pleading: **PETITION**

Date of Service:

**RETURNED**

Reason: NO LONGER EMPLOYED PER EMPLOYER

Issued by the Clerk of Court on June 11, 2021.



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David Ditch  
Clerk of Court  
Iberia Parish  
16<sup>th</sup> Judicial District Court  
P.O. Box 12010  
New Iberia, LA 70560

CITATION

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC., ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

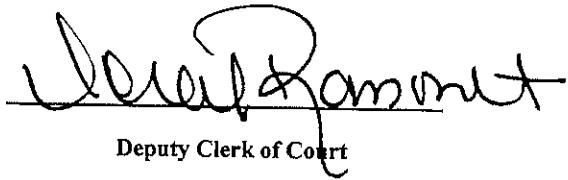
To: RAINBOW USA, INC.  
THROUGH ITS REGISTERED AGENT,  
CT CORPORATION SYSTEM  
3867 PLAZA TOWER DRIVE  
BATON ROUGE, LA 70816

of EAST BATON ROUGE Parish

You are hereby summoned to comply with the demand contained in the PETITION of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
3 DAY OF June 2021

Clerk of Court  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

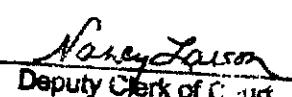
  
Deputy Clerk of Court

Requested by:  
AYO R. ALSTON-MOORE

I made service on the named party through the  
CT Corporation  
JUN 10 2021  
by tendering a copy of this document to  
Ashley Minvielle  
E. CUMMINS  
Deputy Clerk of Court, East Baton Rouge, Louisiana

**FILED**  
PARISH OF IBERIA, LA

JUN 18 2021

  
Deputy Clerk of Court

[ORIGINAL]

## NOTICE OF SERVICE

ARMELIN, JACKLYN

VERSUS

RAINBOW USA, INC. - ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

To: **DOMINICK BIANCA**  
**BIANCA LAW FIRM**  
**8212 SUMMA AVE**  
**BATON ROUGE, LA 70809**

Party **RAINBOW USA, INC.** THRU ITS REGISTERED AGENT, **CT CORPORATION SYSTEM** was SERVED.

Pleading: **PETITION**

Date of Service: **Thursday, June 10, 2021**

**PERSONAL**                   **THRU ASHLEY MINVIELLE**

Reason:

Issued by the Clerk of Court on June 21, 2021.



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David Ditch  
Clerk of Court  
Iberia Parish  
16<sup>th</sup> Judicial District Court  
P.O. Box 12010  
New Iberia, LA 70560

Jun. 24. 2021 2:52PM

No. 3585 P. 1



Frilot L.L.C.  
1100 Poydras Street, Suite 3700  
New Orleans, Louisiana 70163  
Phone: 504.599.8000  
Facsimile: 504.599.8100  
[www.frilot.com](http://www.frilot.com)

## FAX FILING

Date: June 24, 2021

To: Clerk of Court  
22<sup>nd</sup> Judicial District Court,  
Parish of Iberia

Fax No.: (337) 365-0737

Cc: Dominik Bianca  
Fielding Matkins

Via Certified Mail:  
8212 Summa Ave.,  
Baton Rouge, LA 70809

Re: *Armelin v. Rainbow USA, Inc. et al.*  
Case No. 137507 Division B

From: Victoria Graham  
Labor & Employment Paralegal

Total Pages: 3, including cover sheet

**Comments:** Please find attached Defendant Rainbow USA, Inc.'s *Motion for Extension of Time to File Responsive Pleadings*. Once we receive your receipt for filing and service fees, we will forward the original documents along with payment of the associated court costs.

Thank you for your prompt attention to this matter.

If you did not receive all pages, or if you received this facsimile in error, or are not the designated recipient or agent thereof, please immediately call Victoria Graham at (504) 599-8094.

**Attention:**

The contents of this facsimile is confidential information, and may also be legally privileged, intended only for the use of the individual/individuals of the entity named above. If you are not the intended recipient or agent thereof, you are hereby notified that any use, review, dissemination, copying or distribution of this document or the information contained herein is strictly prohibited.

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF IBERIA  
STATE OF LOUISIANA

NO. 137507

No. 3882  
DIVISION B

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC. and SAVOYE HOWARD

FILED: \_\_\_\_\_

DEPUTY CLERK

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE  
PLEADINGS

NOW INTO COURT, through undersigned counsel, comes Rainbow USA, Inc. ("Rainbow"), who, without waiving and expressly maintaining all of its exceptions, defenses, objections and arguments, respectfully moves for an extension of time until July 26, 2021, to file responsive pleadings to Plaintiff's Petition for Damages ("Petition").

This is Rainbow's first request for an extension of time to respond to Plaintiff's Petition. Counsel for Plaintiff has been contacted and does not oppose the requested extension.

Respectfully Submitted,

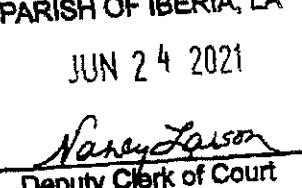
FRILOT L.L.C.

  
LESLIE W. EHRET (Bar No. 18494)  
ANNA K. POTTER (Bar No. 38376)  
1100 Poydras Street, Suite 3700  
New Orleans, LA 70163  
Telephone: (504) 599-8000  
Facsimile: (504) 599-8100  
Attorneys for Defendant, Rainbow USA, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served upon all known counsel of record the Unopposed Motion for Extension of Time to File Responsive Pleadings, via United States mail, first class postage prepaid, and/or electronic transmission this 24th day of June, 2021.

  
Leslie W. Ehret

  
FILED

PARISH OF IBERIA, LA

JUN 24 2021

Nancy Larson  
Deputy Clerk of Court

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF IBERIA

STATE OF LOUISIANA

NO. 137507

DIVISION B

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC. and SAVOYE HOWARD

FILED: \_\_\_\_\_

DEPUTY CLERK

ORDER

Considering the foregoing Unopposed Motion for Extension of time to File Responsive Pleadings ("Motion for Extension") filed by Defendant Rainbow USA, Inc. ("Defendant"),

IT IS HEREBY ORDERED that Defendant's Motion for Extension is GRANTED and Defendant's Motion for Extension is hereby filed.

St. Martinville, Louisiana, this \_\_\_\_\_ day of June, 2021.

HONORABLE SUZANNE de MAHY, JUDGE

*Taylor*  
**FILED**  
PARISH OF IBERIA, LA  
JUN 24 2021  
*Nancy Taylor*  
Deputy Clerk of Court

\* \* \* Communication Result Report (Jun. 24, 2021 3:10PM) \* \* \*

1) IBERIA PAR CLK OF CT  
2)

Date/Time: Jun. 24, 2021 3:09PM

File No.	Mode	Destination	Pg(s)	Result	Page
7691	Memory TX	915045998100	P. 1	OK	Not Sent

Reason for error  
 E. 1) Hang up or line fail  
 E. 2) Busy  
 E. 3) No answer  
 E. 4) No facsimile connection  
 E. 5) Exceeded max. E-mail size  
 E. 6) Destination does not support IP-Fax

FAX CONFIRMATION	
JACKLYN ALMELIN <i>[Redacted]</i> Versus <i>[Redacted]</i> RAINBOW USA, INC., ET AL	Case #0137387 Division: A 16 <sup>th</sup> Judicial District Court Parish of Harris State of Louisiana
<b>YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS BEEN FILED BY FAXIMILE.</b>	
DATE FAX TRANSMISSION RECEIVED: JUNE 24, 2021	
DESCRIPTION OF TRANSMISSION: MOTION AND ORDER FOR EXTENSION OF TIME	
FILED ON BEHALF OF: RAINBOW	
PERSON SIGNING PLEADING: LESLIE W. EHRET	
<p><i>This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:850.</i></p> <p><i>The original pleading is to be forwarded within seven (7) days, exclusive of legal holidays, of this confirmation together with the \$5.00 transmission fee; \$15.00 fee for this confirmation; the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.</i></p> <p><i>The record will contain the facsimile pleading, this confirmation and the original pleading.</i></p>	
<p>NANCY LARSON Deputy Clerk of Court</p> <p>Confirmation faxed to number: 1-504-599-8100 Date confirmation faxed: JUNE 24, 2021</p> <p><b>***Amount due: \$60.00***</b></p>	

**STATEMENT**

**Clerk of Court - Iberia Parish**

**David Ditch**  
Clerk of Court

16th Judicial District

P. O. Drawer 12010 - Zip: 70562-2010  
300 Iberia Street, Ste. 100  
New Iberia, LA 70560  
Phone : (337) 365-7282

Statement Date	Case Number	Amount Due
06/30/2021	00137507 - Division B	\$32.00

**Attorney Firm :** FRILOT, L.L.C.

**IN RE :**

ARMELIN, JACKLYN

**Attorney Name :** EHRET, LESLIE W.

VS.

RAINBOW USA, INC. AND HOWARD,  
SAVOYE

**Party :** Defendant - RAINBOW USA, INC.

Date	Description	Amount
06/30/2021	<b>Court costs to date in above entitled numbered matter</b>	\$32.00
	<b>Refunds Paid</b>	\$0.00
	<b>Advance Deposit</b>	\$0.00
		<hr/> <b>\$32.00</b>

**THE IBERIA PARISH CLERK OF COURT'S OFFICE IS NOW ACCEPTING E-FILING.**

**FOR MORE INFORMATION, PLEASE SEE THE LINK ON OUR WEBSITE AT**  
**IBERIACLERK.COM**

FRILOT, L.L.C.  
1100 POYDRAS STREET, STE. 3700  
NEW ORLEANS, LA 70163

**FRILLOT** | LLC

ATTORNEYS AT LAW

Frilot L.L.C.  
1100 Poydras Street, Suite 3700  
New Orleans, Louisiana 70163  
Phone: 504.599.8000  
Facsimile: 504.599.8100  
[www.frilot.com](http://www.frilot.com)

Leslie W. Ehret  
Partner  
504.599.8203 direct  
504.599.8263 fax  
[lehret@frilot.com](mailto:lehret@frilot.com)

Victoria N. Graham  
Paralegal  
504.599.8094 direct  
504.599.8100 fax  
[vgraham@frilot.com](mailto:vgraham@frilot.com)

June 25, 2021

**Via FedEx, TRK No. 7741 0067 8464**

Clerk of Court  
16<sup>th</sup> Judicial District Court  
300 Iberia Street, Suite 100  
New Iberia, LA 70560

Re: *Armelin v. Rainbow USA, Inc. and Savoye Howard*  
16<sup>th</sup> Judicial District Court, Parish of Iberia, State of Louisiana  
Case No. 137507      Division B      Docket No. 2020-CA-0816

To Whom It May Concern:

On behalf of Ms. Ehret and with regard to the above captioned matter, enclosed please find Rainbow USA, Inc.'s original Motion for Extension of Time to File Responsive Pleadings, three courtesy copies of the same, the fax filing receipt, and a check in the amount of \$60.00 for the fax filing fee. Please return the original motion to us using the pre-addressed FedEx envelope also enclosed.

Sincerely,



Victoria N. Graham

vng  
Enclosures

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF IBERIA  
STATE OF LOUISIANA

NO. 137507

DIVISION B

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC. and SAVOYE HOWARD

FILED: \_\_\_\_\_

DEPUTY CLERK

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE  
PLEADINGS**

NOW INTO COURT, through undersigned counsel, comes Rainbow USA, Inc. ("Rainbow"), who, without waiving and expressly maintaining all of its exceptions, defenses, objections and arguments, respectfully moves for an extension of time until July 26, 2021, to file responsive pleadings to Plaintiff's Petition for Damages ("Petition").

This is Rainbow's first request for an extension of time to respond to Plaintiff's Petition. Counsel for Plaintiff has been contacted and does not oppose the requested extension.

Respectfully Submitted,

FRILLOT L.L.C.

  
LESLIE W. EHRET (Bar No. 18494)  
ANNA K. POTTER (Bar No. 38376)  
1100 Poydras Street, Suite 3700  
New Orleans, LA 70163  
Telephone: (504) 599-8000  
Facsimile: (504) 599-8100  
Attorneys for Defendant, Rainbow USA, Inc.

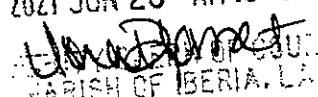
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have served upon all known counsel of record the Unopposed Motion for Extension of Time to File Responsive Pleadings, via United States mail, first class postage prepaid, and/or electronic transmission this 24th day of June, 2021.

FILED  
FOR RECORD

  
Leslie W. Ehret

2021 JUN 28 AM 10:51

  
CLERK OF COURT  
PARISH OF IBERIA, LA

16th JUDICIAL DISTRICT COURT FOR THE PARISH OF IBERIA

STATE OF LOUISIANA

NO. 137507

DIVISION B

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC. and SAVOYE HOWARD

FILED: \_\_\_\_\_

DEPUTY CLERK

ORDER

Considering the foregoing Unopposed Motion for Extension of time to File Responsive Pleadings ("Motion for Extension") filed by Defendant Rainbow USA, Inc. ("Defendant"),  
*to July 26, 2021*  
IT IS HEREBY ORDERED that Defendant's Motion for Extension is GRANTED and  
Defendant's Motion for Extension is hereby filed.

New Iberia

St. Martinville, Louisiana, this 29 day of June, 2021.

*Suzanne de Maify*  
HONORABLE SUZANNE DE MAIFY, JUDGE

I hereby certify that a copy  
of this pleading was mailed to  
Attala County Clerk  
on 7/1/21.

*Deputy Clerk*

Deputy Clerk of Court  
Iberia Parish, La.

*FILED  
2021 JUN 28 AM 10:51  
Suzanne de Maify  
CLERK OF COURT  
16TH JUDICIAL DISTRICT COURT  
PARISH OF IBERIA, LA.*



Dominick M. Bianca, LLC

Email: [rusty@biancalawfirm.com](mailto:rusty@biancalawfirm.com)

June 22, 2021

Clerk of Court  
P.O. Box 12010  
New Iberia, LA 70562

Re: Jacklyn Armelin v. Rainbow USA, Inc. and Savoye Howard  
Docket #00137507, Div. B, 16<sup>th</sup> JDC

#137507

Dear Sir/Madam:

Please find attached a copy of a Petition for Damages in the above captioned matter. Please issue a citation and have service effected on:

Saviye Monique Howard at 716 Mary St., New Iberia, LA 70560.

It is our understanding that there are funds available on the docket at this time. Should you have any questions, please do not hesitate to contact.

Very truly yours,

*Cynthia Sanders*  
CYNTHIA SANDERS  
Paralegal

FILED June 28, 2021  
*[Signature]*  
DEPUTY CLERK OF COURT  
IBERIA PARISH, LA

8212 Summa Ave. Baton Rouge, LA 70809 • Phone (225)925-2877 • Fax (225)925-2875

**CITATION**

JACKLYN ARMELIN

VERSUS

RAINBOW USA, INC., ET AL

Case: 00137507  
Division: B  
State of Louisiana  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

To: **SAVOYE HOWARD**  
**716 MARY STREET**  
**NEW IBERIA, LA 70560**

of **IBERIA** Parish

You are hereby summoned to comply with the demand contained in the **PETITION** of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, the 16th Judicial District Court in and for the Parish of Iberia, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT NEW IBERIA, LOUISIANA, THIS  
2 DAY OF *July*, 2021.

Clerk of Court  
16<sup>th</sup> Judicial District Court  
Parish of Iberia

Deputy Clerk of Court

Requested by:  
BIANCA LAW FIRM